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1 IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE
2 IN AND FOR NEW CASTLE COUNTY

3 CIRRUS HOLDING COMPANY, LTD. :
4 :
5 vs. : C.A. No. 18978
6 :
7 CIRRUS INDUSTRIES, INC., AND :
8 AEROGLOBAL CAPITAL MANAGEMENT, :
9 LLC :
10 :
11

12 DEPOSITION OF CHRISTOPHER R. MOE, a Witness in the
13 above-entitled cause, taken on behalf of the
14 Plaintiff, before Angela M. Gallogly, RPR, Notary
15 Public in and for the State of Rhode Island, held at
16 43 Cliff Avenue, Newport Rhode Island, on July 10,
17 2001, at 10:00 A.M.

18 -APPEARANCES-:

19 FOR THE PLAINTIFF.....MORRIS, NICHOLAS, ARSHT & TUNNELL
20 BY: WILLIAM M. LAFFERTY, ESQUIRE
21 1201 NORTH MARKET STREET
22 WILMINGTON, DE 19801

23 FOR THE DEFENDANT.....SPECTOR, GADON & ROSEN, P.C.
24 (AEROGLOBAL) BY: TIMOTHY C. RUSSELL, ESQUIRE
1635 MARKET STREET - 7TH FLOOR
PHILADELPHIA, PA 19103

25 FOR THE DEFENDANT.....DORSEY & WHITNEY, LLP
26 (CIRRUS INDUSTRIES) BY: MATTHEW MacKINNON SHORS, ESQ.
27 PILLSBURY CENTER SOUTH
28 220 SOUTH SIXTH STREET
29 MINNEAPOLIS, MN 55402-1498

30 ALLIED COURT REPORTERS
31 115 PHENIX AVENUE
32 CRANSTON, RHODE ISLAND 02920
33 (401) 946-5500
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1 Q. Yes. Does it contain any references?

2 A. No, it does not.

3 Q. Do you, as a matter of practice, communicate via
4 e-mail?

5 A. As compared to what?

6 Q. Compared to fax or mail?

7 A. I communicate with all known technologies.

8 Q. Who are the members of AeroGlobal Capital Management,
9 LLC?

10 A. There are three members; Craig Millard, personally
11 or corporately, I think that's still an open question,
12 Boundary Waters Holdings, and GH Venture Partners,
13 LLC.

14 Q. What is Boundary Waters Holding?

15 A. I don't really know.

16 Q. Do you know who owns it?

17 A. Yes.

18 Q. Who owns it?

19 A. Keith Fitzgerald. I presume it is a personal
20 management or holding company.

21 Q. Does an LLC Agreement exist relating to AeroGlobal
22 Capital Management, LLC?

23 MR. RUSSELL: You mean a formal
24 operating agreement?